



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Brian Amme
Project Manager
BLM Nevada State Office
1340 Financial Blvd.
P.O. BOX 12000
Reno, NV, 89520-0006

Dear Mr. Amme:

EPA has reviewed the Bureau of Land Management's (BLM) Final Programmatic Environmental Impact Statement (Final EIS) on the use of approved herbicide active ingredients on human health and the environment, and the accompanying Programmatic Environmental Report (PER) analyzing non-herbicidal vegetation treatments such as fire, manual, mechanical and biological control methods accounting for treatment to approximately 5 million treated acres. Herbicide and non-herbicide treatments will both be used to develop the integrated vegetation management (IVM) program that will apply to approximately 262 million acres of BLM public land in 17 Western states, including Alaska. Our comments are provided pursuant to our responsibilities and authorities under section 309 of the Clean Air Act and the National Environmental Policy Act.

The Final EIS analyzed 5 alternatives and the potential environmental impacts associated with the use of these 20 approved herbicide active ingredients. The PER discloses potential impacts to human health and the environment from non-herbicide treatments, including but not limited to fire, mechanical, manual and biological controls. These impacts were considered in predicting cumulative impacts for the Final EIS.

Alternatives analyzed in the Final EIS include a No Action Alternative, which would continue present management actions. In addition, there are four action alternatives: 1) the Preferred Alternative which provides for herbicide treatment on 932,000 acres annually and the adoption of four new herbicides for use on public lands; 2) a No Herbicide Use Alternative; 3) a No Ariel Spraying Alternative; and 4) a Restriction Alternative allowing only non-acetolactate synthease inhibiting active ingredients in herbicide formulations.

EPA recognizes the complex task charged to the land managing agencies to reduce the risk from wildfire and invasive plants. To that end, the preferred alternative predicts that up to 932 million acres of public lands could be treated annually to control vegetation resources to reduce

the risk of catastrophic wildfire and the spread of invasive plant species, both terrestrial and aquatic. The Final EIS indicates that the selected management actions are expected to further reduce the risk of catastrophic wildfire by reducing hazardous fuels, restoring fire damaged lands, and improving ecosystem health by controlling weeds and invasive species and managing vegetation to benefit fish and wildlife habitat, improving riparian and wetland areas and improving water quality in priority watersheds.

BLM has responded adequately to most of EPA's comments on herbicide use. The documents state that BLM will assess and choose the best scenario at the project level by requiring the use of herbicides be compared to other management techniques such as prescribed fire, beneficial insects, manual and mechanical methods such as weed pulling and mowing. The inclusion of information in Appendices D and E were responsive to this issue. EPA would expect regional and site specific NEPA documents would include information ensuring adequate monitoring and the description of evaluation methods to determine if application rates are effective, buffers are sufficient, drift is minimized and specific goals and endpoints are being met. BLM has included a process to adopt newer, less toxic herbicides in Appendix E and the Preferred Alternative would allow the use of new active ingredients that are developed in the future that meet a set of specific criteria. EPA is available to work with BLM to provide data to increase the precision of predictions and to reduce the risk of causing unintended effects of herbicides to human health and non-target species.

EPA continues to have concerns about the cumulative impacts to air quality because without considering other management activities that will be conducted under the land management plan that potentially have impacts to air quality this is an underestimate. The Final EIS states that the modeling of a typical, hypothetical scenario will not exceed National Ambient Air Quality Standards, PM 10 and PM 2.5. EPA appreciates the responses to our issues related to air quality relating to the CALPUFF-lite model and background concentrations, the use of default data instead of actual data for the hypothetical scenarios and whether or not one year of meteorological data is adequate. EPA would welcome the opportunity to discuss these issues and work with you as you refine and update your emissions inventory, address individual and total uncertainties in the Long Range Transport analysis, Appendix W (subsection 6.2.3), and evaluate the results of the analysis of actual operational conditions.

EPA appreciates the opportunity to review the Final EIS and PER, and looks forward to collaborating with BLM further on the future phases of this action. In the interim, should you have any questions about our comments, I can be reached at 202/564-5400, or you can contact Elaine Suriano of my staff at 202/564-7162.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Anne Norton Miller", is written over a horizontal line.

Anne Norton Miller

Director

Office of Federal Activities